

**National Advisory Committee on Meat and Poultry Inspection Meeting
October 12-13, 2006**

Subcommittee 1 Report

Issue: *Using Risk to Direct In-Plant Processing and Off-Line Slaughter Inspection Activities*

The Subcommittee was asked to respond to three questions.

1. *What information should we use to support the optimal levels of inspection?*
2. *What are the essential inspection activities for level 1 inspection?*
3. *What other Inspection activities do you consider appropriate to perform in RBI [Risk Based Inspection] above level one (or 1/L)?*

1. What information should we use to support the optimal levels of inspection?

This question seeks to determine how many levels there should be in the risk rankings, and how the agency will determine the number of levels.

The Subcommittee started with the five levels suggested in the issue paper and discussed the pros and cons of using five levels as well as more or less than five levels. In the beginning of the discussion, the subcommittee favored the five levels created by having three levels on each axis. However, in the course of the discussion the Subcommittee came to the conclusion that using a single designation, such as three, for firms that had different levels of inherent risk and process control risk may not be appropriate, i.e. a firm with low product inherent risk and high process control risk may not be equally risky with a firm that had high product inherent risk and low process control risk. Therefore, the Subcommittee concluded that the rankings would provide more detail or granularity if the inherent risk and process control risk were listed separately, with a number and a letter, e.g. 1/h. This would effectively create nine levels.

The characteristics of the information used to support the selection of the number of levels are the following:

- Granularity
- Manageability
- Training complexity

The Subcommittee believed that using more levels would create problems for managing and training, and fewer levels would not allow for enough distinction between levels. It also believed that plant management and inspectors should have access to the data that went into making the risk analysis determination.

2. What are the essential inspection activities for level 1 inspection?

The Subcommittee started by listing the various activities that take place during an inspection. These include:

- HACCP [Hazard Analysis and Critical Control Point] and SSOP [Sanitation Standard Operating Procedures] records review
- Pathogen records review
- Onsite observation of CCPs [Critical Control Point] and sanitation, including pre-operational inspection
- Other consumer protection verification procedures such as labeling

The Subcommittee realized that this was a fairly comprehensive list, in general terms, of current inspection activities, and none of the current inspection activities should be left out. Rather FSIS should use the risk ranking and other information to determine the frequency and how much time should be spent at each activity. It will be important to consider the factors that determine each plant's ranking when assigning the inspection activities.

The activities above are a comprehensive list of things we do. The issue is more not *what* FSIS does but more in terms of *how often* we do these activities. This depends on where you fit in the risk categories. Essentially, for level 1, the Subcommittee considered what things are the one or two things you would do as a minimum for food safety on a daily basis? These include

- CCP verification,
- Sanitation verification (operational and periodic pre-operational), and
- Pathogen reduction activities where required by the production.

We would expect inspection personnel to conduct a walk through on arrival and if there are issues that need to be attended to, we expect inspectors to address those things. The Subcommittee also discussed the concern that a limit of inspection to CCPs may not be a good idea since some plants “manage” CCPs to limit inspection.

3. What other Inspection activities do you consider appropriate to perform in RBI above level one (or 1/L)?

The Agency inspection personnel should perform all applicable PBIS [Performance Based Inspection System] procedures, such as verification of the plant's own verification activities, including:

- Calibration activities
- Direct observation activities
- Records review

Another task would be the review of corrective action activities.

These activities and their frequency or intensity is dependent on the link to where a plant fits along the x & y axis categories. The inspector should document the regulatory requirement of the HACCP/SSOP/SPS [Sanitation Performance Standards] procedure has been verified. These activities should be considered at all levels of intensity.

Inspection activities intensity should increase with less control of the plant, and increased product inherent risk. The intensity is not necessarily proportional to the risk number. This eliminates the randomness and focuses or targets inspection efforts. Intensity suggests the frequency of activities and time. It may be necessary for inspection presence to be there for increased oversight and to perform unscheduled inspection activities. This is more critical in plants with variable control.